



North Weald Bassett PARISH COUNCIL

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MM Consultation 2021
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FAO: Planning Policy Team

RESPONSE TO SUBMISSION VERSION OF THE LOCAL PLAN MAIN MODIFICATION CONSULTATION

On 15th July 2021 Epping forest District Council launched its Main Modifications (MM) Consultation for the Submission Version of the Epping Forest District Local Plan in order to address issues of soundness and/or legal compliance identified by the Inspector.

Following the close of the consultation, any representations will be passed to the Inspector for her consideration before the publication of her final report

The supporting guidance notes for the consultation state that 'This consultation is confined to the MM Schedule and associated supporting documents' and that 'no representations should be made about parts of the Plan that are not proposed to be modified. Such representations will not be considered by the Inspector.' It also states that 'it is not necessary to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspector.' The notes also say to 'avoid lengthy comments on the supporting documents'.

Taking all these factors into account, this letter is both this Councils response to the MM Consultation, and a public statement setting out the position of the Parish Council. There will be matters contained within this letter that the inspector will not consider but may be important to local residents and to the Parish Council, and as such cannot and will not be excluded from this Councils response.

In order to assist the inspector:

- Part 1 (pages 2-3) of this response will deal with matters of utmost importance to local residents, but does not directly address the main modifications.
- Part 2 (pages 4-7) deals specifically with the main modifications and this Councils response to them.

In addition, the Schedule of Main Modifications (ED130) page 2 'How to comment on the proposed Main Modifications' seems to suggest that responses can only be made either by using the online form or a downloadable version of the online form. This Council feels that to respond using this form would be too restrictive and would prohibit the Council from responding fully covering the points it wishes to make, and as such has taken the decision to respond via letter. It should also be noted that some residents may also be prohibited from responding, especially if they do not have access to the internet or a printer. It is hoped that as a responsible authority, EFDC will accept this letter as the response of North Weald Bassett Parish Council to the Main Modification consultation.

PART 1

The District Council started its local plan preparation in 2010, meaning it has so far taken 11 years to reach this stage.

In June 2013, the responses to the Community Choices (Issues & Options) consultation for the Local Plan identified there was a clear preference with residents of Epping Forest district for the 'basic' Spatial Option 1: Proportionate distribution (24%), meaning development should be distributed evenly across the district subject to any constraints. MM11 provides an update to the components of housing land supply over the period 2011-2033, detailing the total number of homes already built up to 2020, and the sites already benefitting from planning permission. MM15 provides an update on the allocation of new homes being built in the district. Taking these MMs and newly updated figures into account, it identifies that North Weald Bassett Parish will be receiving 27.04% of the total housing allocation in the District – over a quarter of the entire allocation up to 2033 (2,272 new homes). How is this proportionate distribution? How is this fair to the residents of North Weald Bassett Parish?

There are of course a number of factors which, it will be stated, have contributed towards this disproportionate distribution, such as the Epping Forest Special Area of Conservation (SAC). Whilst some of these factors are indeed perfectly valid and understood, it remains a reality that by default development will be pushed to the more rural areas of the District – areas that are not sustainable and in most cases rely entirely on the personal motor car for transport (other than very short journeys to local key areas within each individual village). This seems counter productive. The proximity of Thornwood, North Weald and Hastingwood to Epping Underground, the attractive employment offer from London, the constraint of the lower forest, and the inability of anyone to make a tangible difference to congestion at The Plain Junction in Epping, seems to have been entirely overlooked. To locate such large numbers of homes in one small area, without any realistic plans for supporting sustainable infrastructure, will undoubtedly cause problems for the Parish in the future.

The argument put forward by the District Council is that this new development will help these smaller areas 'become more sustainable' by providing the mechanism by which developers will have to prove how their developments will provide a real 'modal shift' in travel behaviour. The only sustainable transport possibilities for our parish are buses. Creating suitable cycling routes between villages and into Epping is not only cost prohibitive, but not a possibility due to the restrictions of the lower forest. This is the same for Thornwood to Epping. To cycle either of these routes is to risk one's life! The areas within North Weald Bassett Parish are not served by rail services. Despite the efforts of any developer, the reality of the situation is that even if they fund a bus or two for a few years, these buses will not be frequent or reliable enough to affect the required modal shift, and the reliance on a personal car will remain.

There is an argument that many residents may be able to accept the amount of housing being proposed for this area if there was a clear 'benefit' that could be seen, such as greatly improved community facilities, better transport links and routes, or amenities that would improve the daily lives of current residents. There is no evidence that this is the case, and the Infrastructure Delivery Schedule falls short of providing North Weald Bassett with the facilities it not only deserves, but which it will need in order function as a community. This is evidenced within MM87 which removes the requirement for a new leisure centre at North Weald Airfield. Instead this is being located in Epping, which has seen a reduction in the number of homes being built there.

One of the biggest faults in the current Local Plan system is that it is devoid of taking into account 'how people feel', and is instead based on meeting housing targets set by Government over all else. This is the priority of the District Council because the Governments planning policy forces it to be so. The fact that people moved to a village because they like the 'village feel' and that this is where they are choosing to lay roots, bring up families, or even retire, has no weighting at all in the planning system. Choosing to live in an area because of its vast open green space and accessible unspoilt countryside is totally irrelevant in planning terms. From a resident's perspective, how can this complete disregard of opinion be right? One can see perhaps why residents are loathe to get involved in processes such as the Local Plan as what's important to them is not important to the system, and as such their opinions are totally ignored. It is the system itself which is flawed because it completely disregards emotions and individual choice, and instead favours statistics and targets.

That being said, this Council understands the current position of EFDC with regard to the necessity of getting this plan adopted. In effect we are being forced not to object as the alternative position we are

being threatened with is twice as bad as the one we are currently facing, in that if this plan is found unsound the Government's standard method of calculating local housing need will apply, meaning this District would need to find space for double the number of homes it is already planning for. Given the constraint of the SAC and the ability of Local Plans to amend green belt boundaries, we are fearful that these extra houses would also be disproportionately distributed to areas such as North Weald Bassett.

The complete focus and reliance on a modal shift in travel behaviour deemed essential to make these developments acceptable in planning terms is short sighted and simply unachievable. There are 7 Villages and towns in this District which have the benefit of rail or tube stations, have excellent community facilities including both shopping and leisure, and boast of frequent and reliable bus services. Each of these areas are considerably more sustainable than North Weald Bassett, and almost all of them have seen their housing allocations decrease as part of this consultation. Two of these more sustainable locations have allocations of less than 60 new homes. **The Parish Council being the body that represents local people in our parish, feels strongly that the implications arising from the disproportionate level of new housing allocated to this Parish, combined with the substantial commercialisation of the airfield without the necessary infrastructure, will be seen as grossly unfair by North Weald residents. This Council strongly agrees with this sentiment.**

PART 2

The following are responses to the Main Modifications (MM):

Main Modification	Comment
MM3	<p>This MM sets out what are classed as being Strategic Policies for the purposes of Neighbourhood Planning. However, Chapter 2 (which is entitled Strategic Context and Policies) would seem to suggest that it is only those policies contained within Chapter 2 that are strategic in nature (hence the title). This is confusing and implies that the strategic policies for the purpose of the Local Plan are different to those for a Neighbourhood Plan. Is this the case? This needs correcting to avoid confusion. It should be clear which are strategic policies in the Local Plan, and as such this would be clear for any neighbourhood planning groups. The Council feels that if the strategic policies in the Local Plan were in themselves clear, this MM would not be needed.</p> <p><i>REASON: This MM adds more confusion.</i></p>
MM8	<p>Identifies that development needs will be met in the most sustainable locations. This Council feel this is incorrect, specifically with regard to North Weald Village. Development is being proposed here to 'help make the village more sustainable', not because it is a sustainable location.</p> <p><i>REASON: Statement is incorrect – development is not being proposed in the most sustainable locations.</i></p>
MM16	<p>This Council fully supports the insertion of new paragraphs after paragraph 2.88 with regard to healthcare provision and the introduction of HIAs.</p> <p><i>REASON: To ensure sufficient healthcare provision for both current and future residents.</i></p>
MM18	<p>This Council supports the insertion of a new paragraph after paragraph 2.117.</p> <p><i>REASON: To prevent unsustainable travel patterns / behaviour.</i></p>
MM20	<p>This Council does not support the proposed modification which will see the numbers of homes at Latton Priory change from 'approximately 1,050' to 'a minimum of 1,050'. The Developer has already expressed their intention to place at least 1,500 new homes on the site, and this proposed</p>

	<p>modification gives them carte blanche to do so. As part of the Local Plan process, an assessment was undertaken as to the capacity of the sites around Harlow, with concern being expressed that any increase in the original numbers proposed has the potential to have a detrimental effect on the capacity of Junction 7 of the M11 (even when considering the positive impact of Junction 7A).</p> <p><i>REASON: To ensure new development does not overwhelm the already crowded and over capacity junction 7 of the M11.</i></p>
MM33	<p>With regard to the proposed amendment to table 3.1, the Council believes there has been an error made when determining the size of the newly drafted employment area NWB.E4a. Within MM33, this is stated as being 10 hectares of 'indicative development area'. However the amended map (ED131B) which shows this employment site actually has an area of approximately 31 hectares. This is further borne out by the newly labelled existing employment site at the Airfield (NWB.E4B) being stated in MM86 (para 5.95) as being 9.92ha. When looking at the map, you can clearly see the size difference in area. This error should be corrected along with the total of the table.</p> <p><i>REASON: To correct an error in sizing.</i></p>
MM40	<p>This Council supports the proposed modification of paragraph 3.90 to state that 'All such spaces must have direct access to the charging points to be provided.</p> <p><i>REASON: To ensure appropriate electrical charging points are available for all properties.</i></p> <p>This Council would like to propose an amendment to the proposed additional paragraph under 3.91 which is set to read 'These corridors will provide the high quality sustainable connectivity between the existing and new communities and key destinations'. This Council feels that the words 'within Harlow' should be added to the end of this sentence, as there are no proposed sustainable transport modes proposed between Latton Priory and Thornwood, Epping or North Weald. Thus, the only sustainable connectivity is within Harlow itself.</p> <p><i>REASON: To provide clarity, as the proposed amendment suggests there is sustainable connectivity proposed to all neighbouring villages, which there is not.</i></p> <p>With regard to the proposed creation of new and amended paragraph under 3.92, this Council feels that the words 'or comparable sustainable location' should be removed. To establish if an area is a 'comparable sustainable location' requires specific measurable elements, and as written this would be an entirely subjective assessment.</p> <p><i>REASON: To ensure areas such as North Weald and Thornwood (which have no commuter rail or cycling infrastructure and an extremely poor bus service) are not considered a reasonable location at which to reduce parking spaces. Without significant investment in sustainable transport modes to locations outside of the North Weald Village and Thornwood, residents will continue to rely on the private car for travel anywhere outside of their respective areas.</i></p>
MM41	<p>This Council supports the proposed modification of Policy T 1 Sustainable Transport Choices (G) which will require that 'all new parking spaces</p>

	<p>provided as part of a development must provide direct access to electric vehicle charging point’.</p> <p><i>REASON: To ensure the move towards electric vehicles is an attractive and viable option.</i></p>
MM42	<p>This Council supports the proposed addition to the end of paragraph 3.96 which states ‘Notwithstanding the move towards electric vehicles such sites will continue to be needed including, in some cases, to provide electric vehicle charging opportunities.’</p> <p><i>REASON: To ensure the future availability of fuels for non-electric vehicles in an area where the majority of residents still rely on a private motor vehicle as a result of a poor sustainable transport offer.</i></p>
MM52	<p>This Council does not support the proposed modification to paragraph 4.52 as it completely undermines the powers afforded to local communities to designate Local Green Spaces by way of Neighbourhood Plans. This proposed modification implies that it is the District Councils decision as to what spaces Neighbourhood Plans can designate. A Parish or Town Council or Neighbourhood Forum is a qualifying body in its own right, and as such is able to designate Local Green Space through the Neighbourhood Plan process. This decision is judged by way of a referendum of the community and via inspection by an examiner.</p> <p><i>REASON: This proposed modification undermines the legislation afforded to qualifying bodies producing a Neighbourhood Plan to designate Local Green Spaces.</i></p>
MM55	<p>This council supports all the proposed modifications, with the exception of H. Enabling Development, which sets out that ‘Proposals for Enabling Development that would secure the long-term future conservation of a heritage asset will not be supported unless the significant public benefits secured clearly outweigh the disbenefits of granting permission for the development.’ Whilst the council would support the conservation and long term future of heritage assets, there is concern as to the test for public benefits. A developer may suggest that building 50 new homes is needed to secure a heritage asset and that those 50 homes are a benefit to the country / district, however a more locally focussed approach should be taken as these 50 homes could be detrimental to the amenity of this Parish and our residents. Suggest that the proposed modification could be amended to add the word ‘local’ before ‘public benefits’.</p> <p><i>REASON: In the interests of preserving the historic character of the Parish, and to protect against unsuitable development.</i></p>
MM57	<p>The Council does not support the proposed modification to D, as omitting ‘must be’ in favour of ‘will generally be expected to be’ suggests that there may be occasions when mixed tenure residential development should not be tenure blind. This Council cannot envisage any situation where this would, or should be, acceptable.</p> <p><i>REASON: To ensure good quality, well designed, safe spaces.</i></p>
MM78	<p>The Council is confused as to why it is being proposed to amend Part K of Policy P1 to read ‘<u>approximately</u> 450 homes as opposed to ‘a minimum of’ 450 homes, being as modifications are being proposed for all other masterplans within the District moving from ‘approximately’ to ‘a</p>

	<p>minimum of’.</p> <p><i>REASON: To ensure consistency throughout the plan.</i></p>
MM86	<p>The Council does not support the proposed modification which would see the alteration from ‘approximately 1,050 homes’ to ‘a minimum of 1,050 new homes, and feels instead this should read ‘a maximum of’.</p> <p>In addition, this Council feels that the sentence relating to the North Weald Bassett Masterplanning study (conducted in 2014) should be excluded. The inclusion of the statement that there is potential for the village to accommodate between 500 and 1,600 new homes bears no relevance and serves no purpose, especially considering these figures are no longer feasible given the inclusion of the SANG area on the north-eastern side of the village. Their inclusion is irrelevant, and this sentence should be removed.</p> <p><i>REASON: The village currently has approximately 1,700 houses. The proposal of 1,050 new homes already increases the village by 62%. The 2014 Masterplan tested different scenarios and options, many of which are no longer feasible or are not supported in this Local Plan. Their inclusion simply confuses matters and serves no purpose.</i></p> <p>As per this Councils response to MM33, the site size specific for NWB.E4A is incorrect, and is around 31 hectares as opposed to the 10 hectares as stated. This proposed modification should be amended to show the correct site size.</p> <p><i>REASON: To correct an inaccuracy.</i></p> <p>This Council supports the proposed modification of the inclusion of a new subheading and paragraph after paragraph 5.99 entitled ‘Sustainable Transport Choices’.</p> <p><i>REASON: In order for the new development proposals to be successful, considerable investment is needed in sustainable transport to provide a reliable and realistic alternative to private car use, given the location of the village and the lack of current sustainable transport modes.</i></p> <p>As per the earlier statement, this Council does not support amending P 6, part B, to say ‘a minimum of’ and instead feels this should say ‘a maximum of’.</p> <p><i>REASON: To ensure North Weald Village does not turn into a Town.</i></p> <p>This Council supports the proposed modification to include new Part E to policy P 6, however recommends that in accordance with New Part L of Policy P 1 (Epping) the word ‘comprehensively’ should be included before the word ‘demonstrates’ in the last paragraph.</p> <p><i>REASON: To ensure consistency throughout the plan and provide the framework for delivering sufficient sustainable transport modes.</i></p> <p>This Council supports the proposed modification to include new parts after (i), and amendments to (iv), (v) and (vi).</p> <p><i>REASON: To provide clarity to developers as to what is required.</i></p> <p>This Council supports the proposed modification of Part L including the new part after (v), the amended (vi) and the amended (vii).</p>

	<p><i>REASON: To provide clarity to developers as to what is required.</i></p> <p>This Council does not support the proposed amendment to Part O which removes the requirement for a Leisure Centre.</p> <p><i>REASON: As a result of the quantum of development being proposed for the Parish, there seems to be an abundant lack of leisure facilities being proposed for both current and new residents.</i></p> <p>This Council supports the proposed modification of Part O to include new parts after (iv).</p> <p><i>REASON: To ensure the setting of the control tower on the Airfield is preserved and enhanced, to ensure the provision of SANG, and improved PRow and Cycle links.</i></p>
MM95	<p>This Council supports this proposed modification.</p> <p><i>REASON: To correct an error.</i></p>
MM96	<p>This Council supports the proposed modifications.</p> <p><i>REASON: To provide clarity</i></p>
MM105	<p>Whilst the proposed modification to paragraphs 6.17 doesn't particularly change the context of the paragraph, this Council wishes to state its position that the Infrastructure Delivery Schedule sets out key infrastructure requirements associated with development. If a Developer is able to submit a viability assessment which then excuses it from contributing to this required key infrastructure, how will the necessary key infrastructure then be funded. This Council believes that if infrastructure is a key requirement to make proposed development acceptable in planning terms, then it should be a case of find a way to deliver the infrastructure or don't build the homes.</p> <p><i>REASON: To ensure that the required necessary infrastructure is in place to support both new housing and our current communities.</i></p>
MM108	<p>This Council supports the proposed addition of (iv) after Part B of D 2.</p> <p><i>REASON: To protect community facilities.</i></p>
MM113	<p>This Council feels that if the definition of minor development is being amended to include applications for a Gypsy and/or Travelling showpeople site of 1-9 pitches, then a modification should be made to the definition of major development to include 'Gypsy and/or Travelling showpeople sites of more than 10 pitches'.</p> <p><i>REASON: To ensure clarity and provide consistency.</i></p>
MM192	<p>This Council supports the proposed modification of the section under design.</p> <p><i>REASON: To protect Thornwood Common.</i></p> <p>This Council does not support the proposed modification that consideration should be given to access connectivity to the development site via Brookfields. Please note: The name of this road is Brookfield (without an s) – this should be amended</p>

	<p><i>REASON: Weald Hall Lane is already heavily congested with vehicles parking along the road to access the newly designated employment site (THOR.E4), and intensification of use by further vehicles would be detrimental to the safety of residents along both Weald Hall Lane and Brookfields.</i></p>
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General Comments

It seems there has been a move from specifying that new development should provide for either primary or secondary school buildings / land, and instead wording has been changed throughout all policies to state 'education provision'. Whilst this Council supports this particular amendment for the NWB Masterplan site (as intensification of St Andrews is the preferred option subject to vehicular access north of the school), having a blanket approach leaves the District Council exposed, in that potentially no buildings or land will be provided for new schools.

It is noted that amended Map 2.2 of the Latton Priory Masterplan site does not have a 'Traveller' allocation (indicated by the mixed red and orange lines). This should be amended as the policy requires a Gypsy and Traveller allocation be located on the site.

If you require clarification on any matter contained within this response, please don't hesitate to contact the Parish Clerk in the first instance.

Yours sincerely

Cllr Alan Buckley
Chairman

cc. North Weald Bassett Parish Councillors
Mr Alex Burghart MP